

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

PETRO INDUSTRIAL SOLUTIONS, LLC  
(PETRO),

Plaintiff,

v.

ISLAND PROJECT AND OPERATING  
SERVICES, LLC, VITOL US HOLDING II  
CO., VITOL VIRGIN ISLANDS CORP,  
ANDREW CANNING, OPTIS EUROPE,  
LTD., VTTI, and VITOL, INC.,

Defendants.

CASE NO. 1:21-CV-00312

JURY TRIAL DEMANDED

**NOTICE OF FILING PROPOSED COUNTER-STATEMENT OF FACTS**

Plaintiff Petro Industrial Solutions, LLC (Petro), by and through undersigned counsel, files its  
Proposed Counter-Statement of Facts, attached as **Exhibit 1**.<sup>1</sup>

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: October 14, 2024

BY: /s/ Lee J. Rohn

Lee J. Rohn, Esq.  
VI Bar No. 52  
1108 King Street, Suite 3 (mailing)  
56 King Street, Third Floor (physical)  
Christiansted, St. Croix  
U.S. Virgin Islands 00820  
Telephone: (340) 778-8855  
lee@rohnlaw.com

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<sup>1</sup> In its Motion for Leave to File Counter-Statement of Facts, Petro indicated that he would be filing a proposed counter-statement of facts by separate filing. (Motion for Leave, ECF Doc. 316, p. 3. ).



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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on October 14, 2024, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

All Counsel of Record

BY:     /s/    Lee J. Rohn    (RRL)